

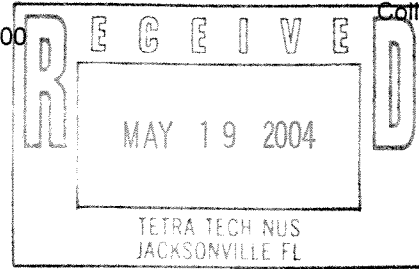


Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

May 10, 2004



Colleen M. Castille
Secretary

Mr. Anthony Robinson
NAVFAC EFD SOUTH
P.O. Box 190010
North Charleston, SC 29419-9010

file: 3A&E_RIFSadd1.doc

RE: Remedial Investigation/Feasibility Study Addendum for Operable Unit 3, Areas A and E,
Naval Air Station Jacksonville; Jacksonville, Florida

Dear Mr. Robinson:

I have reviewed the above document dated January 2004 (received January 26, 2004). The document is an addendum to the original RI that was prepared in 2000. By Partnering Team agreement, Area A is not included in the Feasibility Study portion of the document. Please address the following in the final document:

1. Please prepare a Summary and Conclusions section for the information regarding Area A and Area E since these areas received different foci within the same document (Area A-supplemental investigation; Area E-FS activities); as it is, the supplemental information for Area A is distributed throughout Section 4, and focused conclusions would be useful.
2. As you know, I have had questions regarding the extent of the contaminant plume at Area A. Figure 4-10 presents the latest information in that regard. Please provide a discussion within the document that will describe the reasons why we believe that the plume is adequately described/delineated and, more importantly, the limitations of our knowledge in that regard. In other words, tell me *why* I should be comfortable when I see the TCE concentrations in MW4I and GEW01 bounded closely to the west by a dashed line. I think mention of the proximity of the many nearby buildings is appropriate also. As I have previously indicated, it is far better to describe the limitations of our knowledge than to ignore reasonable, if limited, information. This is good explanatory information for the administrative record and will save questions and concerns at a later date.
3. Please include the details of the official decision by the Partnering Team for Area A described in Section 6.0. Meeting Minutes that explain the rationale will be fine and should be included in the appendix. Mere mention that the Team reached that conclusion is not sufficient.

Mr. Anthony Robinson

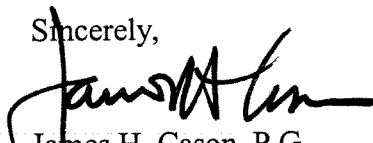
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4. Please explain in the document why it was decided to not try some type of source (including highly contaminated groundwater, not just DNAPL) removal effort in Area E since we seem to believe that DNAPL may be present and such high concentrations of contaminants are observed and the area is relatively small and apparently bounded by a competent clay layer.
5. Please explain in detail in the document why we believe that the area under the clay sequence is not contaminated, or describe the data showing that it is *not* contaminated. If we have data, we need to include it and show the locations of our wells. If we don't have data, we need to explain why. These are normal questions that will logically come up in a Five Year Review. Why not answer them up front when we still have Team members that know those answers? I will need that answer for my management as we get to the Proposed Plan and ROD stages in any case.

Thank you for the opportunity to review this document. I look forward to discussing these comments with you in detail.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

CC: Greg Roof, Tetra Tech NUS, Jacksonville
Pete Dao, EPA Region IV, Atlanta
Jane Beason, NASJAX

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